



Order Filed on May 20, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Robertson, Anschutz, Schneid, Crane & Partners, PLLC**

Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Facsimile: 973-404-888

Harold Kaplan (HK0226)

In Re:

**Andrew Ciccaglione,**

**Debtor,**

**Nora Ciccaglione,**

**Joint Debtor.**

Case No.: 17-27605-JNP

Chapter: 13

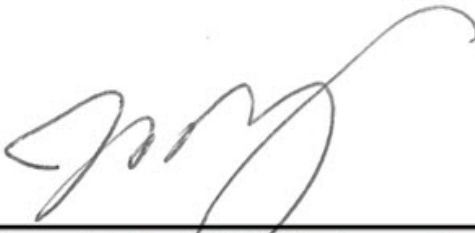
Hearing Date: May 17, 2022

Judge: Jerrold N. Poslusny Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

**DATED: May 20, 2022**

  
\_\_\_\_\_  
Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

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Secured Creditor: Nationstar Mortgage LLC

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners, PLLC

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Debtors' Counsel: Robert Braverman

Property Involved ("Collateral"): 307 New Broadway, Brooklawn, NJ 08030

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:
  - The Debtor is overdue for 3 payments from March 1, 2022 through May 1, 2022 at \$1,271.37 per month.

Funds Held In Suspense \$453.09.

Total Arrearages Due \$3,361.02.

2. Debtor must cure all post-petition arrearages, as follows:
  - Immediate payment shall be made in the amount of \$2,542.74. Payment shall be made within 10 days of entry of this Order.
  - Beginning on June 1, 2022, regular monthly mortgage payments shall continue to be made in the amount of \$1,271.37.
  - Beginning on June 15, 2022, monthly cure payments shall be made in the amount of \$136.38 for 6 months.

3. Payments to the Secured Creditor shall be made to the following address(es):

■ Regular monthly payment: Nationstar Mortgage LLC d/b/a Mr. Cooper  
ATTN: Bankruptcy Dept  
PO Box 619094  
Dallas, TX 75261-9741

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■ Monthly cure payment: Nationstar Mortgage LLC d/b/a Mr. Cooper  
ATTN: Bankruptcy Dept  
PO Box 619094  
Dallas, TX 75261-9741

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

- The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.

The fees and costs are payable:

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- Through the Chapter 13 plan.

☐ To the Secured Creditor within \_\_\_\_\_ days.

☐ Attorneys' fees are not awarded.

6. In the event Secured creditor has not filed a timely Proof of Claim, Debtor consents to the filing and payment by the Chapter 13 Trustee of any late filed Proof of Claim, subject to the right of the Debtor to file an objection as to the amount.

The undersigned hereby consent to the form and entry of the foregoing order.

  
\_\_\_\_\_  
Robert Braverman, Esq.  
*Attorney for Debtor(s)*  
Date: 5/12/22

/s/Harold Kaplan  
\_\_\_\_\_  
Harold Kaplan, Esq.  
*Attorney for Secured Creditor*  
Date: 5/13/2022

13  
SUITE F  
MT. LAUREL, NJ 08054

CLERK U.S. BANKRUPTCY COURT  
U.S. POST OFFICE AND COURTHOUSE  
401 MARKET STREET  
CAMDEN, NJ 08101



US POSTAGE  
ZIP 08054 \$  
02 4W  
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In re:  
Andrew Ciccaglione  
Debtor

Case No. 17-27605-JNP  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-1  
Date Rcvd: May 20, 2022

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 22, 2022:

Recip ID	Recipient Name and Address
db	+ Andrew Ciccaglione, 307 New Broadway, Gloucester City, NJ 08030-2746

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 22, 2022

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 20, 2022 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Toyota Motor Credit Corporation dcarlon@kmlawgroup.com bkgroup@kmlawgroup.com
Harold N. Kaplan	on behalf of Creditor Nationstar Mortgage LLC hkapan@rasnj.com informationathnk@aol.com
Isabel C. Balboa	on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com
Isabel C. Balboa	ecfmail@standingtrustee.com summarymail@standingtrustee.com
Kevin M. Buttery	on behalf of Creditor Nationstar Mortgage LLC kbuttery@moodklaw.com
Laura M. Egerman	on behalf of Creditor Nationstar Mortgage LLC bkyecf@rasflaw.com bkyecf@rasflaw.com;legerman@rasnj.com

District/off: 0312-1

User: admin

Page 2 of 2

Date Rcvd: May 20, 2022

Form ID: pdf903

Total Noticed: 1

Rebecca Ann Solarz

on behalf of Creditor Toyota Motor Credit Corporation rsolarz@kmlawgroup.com

Robert Braverman

on behalf of Debtor Andrew Ciccaglione rbraverman@mcdowelllegal.com  
tcuccuini@mcdowelllegal.com;lwood@mcdowelllegal.com;kgresh@mcdowelllegal.com;kbrocious@mcdowelllegal.com;djamison@mcdowelllegal.com;cgetz@mcdowelllegal.com;bravermanrr62202@notify.bestcase.com

Robert J. Malloy

on behalf of Creditor Freedom Credit Union ecf@robmalloylaw.com

Sindi Mncina

on behalf of Creditor Nationstar Mortgage LLC smncina@raslg.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 11